

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-v-

ANDREY KOSTIN et al.,

Defendants.

Case No. 1:24-cr-00091 (GHW)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendant Vadim Wolfson's Motion to Take Rule 15 Deposition, the Declaration of David C. Rybicki, dated November 12, 2024, and all other papers and proceedings, Defendant Vadim Wolfson will move this Court, before the Honorable Gregory H. Woods, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on the date and time to be set by the Court, for an order to Take Rule 15 Deposition and granting Defendant Vadim Wolfson such other fair and equitable relief as may be appropriate.

PLEASE TAKE FURTHER NOTICE that Defendant Gannon Bond joins in this motion and that the United States opposes it.

Dated: November 12, 2024

/s/ David C. Rybicki
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